

JAP:DAL

M 12- 337

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)
and 960)

UHRI ULRIC FRASER,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

VINCENT MARINO, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about April 18, 2012, within the Eastern District of New York and elsewhere, defendant UHRI ULRIC FRASER, did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing heroin, a Schedule I controlled substance, and a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On or about April 18, 2012, the defendant UHRI ULRIC FRASER arrived at John F. Kennedy International Airport ("J.F.K. Airport") in Queens, New York, aboard Caribbean Airlines Flight No. 526 from Georgetown, Guyana.

2. The defendant UHRI ULRIC FRASER was selected for a Customs and Border Protection ("CBP") examination. During a patdown of the defendant, CBP officers discovered that the defendant UHRI ULRIC FRASER was concealing two packages in the lining of his shorts.

3. The packages were probed, revealing (i) a tan powdery substance that field-tested positive for the presence of heroin and (ii) a white powdery substance that field-tested positive for the presence of cocaine.

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

4. The total approximate gross weight of the heroin found on the defendant UHRI ULRIC FRASER is 226.4 grams. The total approximate gross weight of the cocaine found on the defendant is 270.1 grams.

WHEREFORE, your deponent respectfully requests that defendant UHRI ULRIC FRASER be dealt with according to law.



VINCENT MARINO
Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
18th day of April

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